

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

ANTHONY THOMPSON and KEVIN	)	Civil Action No. 2:16-cv-2357-MBS
SINGLETON, as Co-Personal Representatives	)	
of the Estate of Myra Singleton Quarles	)	
Thompson,	)	
	)	
Plaintiff,	)	<b>PETITION TO APPROVE</b>
	)	<b>SETTLEMENT FOR</b>
	)	<b>SURVIVAL AND WRONGFUL DEATH</b>
v.	)	
	)	
THE UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	

ANTHONY THOMPSON,	)	Civil Action No. 2:16-cv-2406-MBS
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
THE UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	

The duly appointed Co-Personal Representatives of the Estate of Myra Singleton Quarles Thompson petitions the Court pursuant to the Federal Tort Claim Act (FTCA) and S.C. Code Ann. § 15-51-42 for approval of the proposed settlement of a wrongful death and survival action, and would show unto this Honorable Court as follows:

1. The Personal Representatives have reached a proposed settlement with Defendant for wrongful death and survival as set forth in this Petition. That proposed settlement is memorialized in the Stipulation for Compromise Settlement and Release of Federal Tort Claims Act Claims Pursuant to 28 U.S.C. § 2677, attached as **Exhibit A** hereto.

2. Myra Singleton Quarles Thompson (the “Decedent”) was a victim of the Mother Emanuel murder and died as a result of gunshot wounds on or about June 17, 2015, in Charleston,

South Carolina, and brought claims against Defendant as more fully set forth in the Complaint and Amended Complaint on file herein.

3. Defendant denies any liability with respect to the claims and death of the Decedent but has negotiated the settlement herein as a reasonable compromise of disputed claims.

4. Defendant is not insured for claims such as that presented by the Decedent but allows for such claim under the FTCA.

5. The terms of the proposed settlement include the payment of \$7,500,000.00 to Anthony Thompson and Kevin Singleton, as Co-Personal Representatives of the Estate of Myra Singleton Quarles Thompson for the survival and wrongful death actions.

6. The statutory beneficiaries of the Decedent under the wrongful death statute are Anthony Thompson, surviving husband, Kevin Singleton, surviving son and Denise Quarles, surviving daughter.

7. The Decedent died testate and the heirs at law of the Decedent are also Anthony Thompson, surviving husband, Kevin Singleton, surviving son and Denise Quarles, surviving daughter.

8. All creditors of the Estate have been paid in full prior to the filing of the within Petition.

9. The Co-Personal Representatives set forth below has retained counsel listed below and agreed to pay the sum of 25% of the amount recovered for attorney's fees and \$74,065.35 for costs as set forth on **Exhibit B** attached hereto.

10. The Petitioner believes the settlement is in the best interest of the Estate and beneficiaries.

WHEREFORE, the duly authorized Co-Personal Representatives of the Estate of Myra Singleton Quarles Thompson petitions this Court as follows:

1. to approve the proposed settlement with Defendant in the amount of \$7,500,000.00, and subject to all terms and conditions set forth in the Stipulation for Compromise Settlement and Release of Federal Tort Claims Act Claims Pursuant to 28 U.S.C. § 2677, attached hereto as **Exhibit A**, payable to Anthony Thompson and Kevin Singleton, as Co-Personal Representatives of the Estate of Myra Singleton Quarles Thompson for the survival and wrongful death actions, as set forth in this Petition and to execute such further documents as necessary to effectuate settlement;

2. to relieve and discharge Defendant from further liability and all obligations or legal duties to see to the appropriate or proper distribution of the settlement proceeds in accordance the FTCA and with S.C. Code Ann. §15-51-42(E);

3. for an Order providing that, upon payment to the Co-Personal Representatives, the obligations of Defendant be fully and completely released and finally and forever discharged from any further responsibility in connection with the death of Myra Singleton Quarles Thompson; and

4. for an order that attorneys' fees and disbursements as set forth in **Exhibit B** be approved and that the settlement proceeds be distributed as set forth on **Exhibit B**.

RESPECTFULLY SUBMITTED,

By: s/ W. Mullins McLeod, Jr.

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Attorneys for Plaintiff

Charleston, South Carolina

October 28, 2021

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )

**VERIFICATION**

PERSONALLY APPEARED BEFORE ME, Anthony Thompson and Kevin Singleton, in their capacity as Co-Personal Representatives of the Estate of Myra Singleton Quarles Thompson, who being duly sworn, deposes and say that they are the Petitioners in the foregoing action; that they have read the Petition to Approve Settlement for Survival and Wrongful Death, and the same is true and correct of their own knowledge, save and except those matters and things therein alleged on information and belief; and, as to those matters and things, they believe the same to be true and correct.



ANTHONY THOMPSON  
 AS CO-PERSONAL REPRESENTATIVE OF  
 THE ESTATE OF MYRA SINGLETON  
 QUARLES THOMPSON

SWORN TO and subscribed before me this  
26 day of October, 2021.



Notary Public for South Carolina

My Commission Expires: 10/10/23

KEVIN SINGLETON  
 AS CO-PERSONAL REPRESENTATIVE OF  
 THE ESTATE OF MYRA SINGLETON  
 QUARLES THOMPSON

SWORN TO and subscribed before me this  
 \_\_\_\_\_ day of \_\_\_\_\_, 2021.

Notary Public for South Carolina

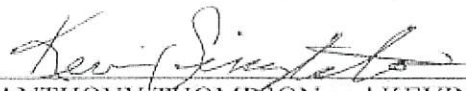
My Commission Expires: \_\_\_\_\_

STATE OF SOUTH CAROLINA )

COUNTY OF CHARLESTON )

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ANTHONY THOMPSON and KEVIN  
SINGLETON, AS CO-PERSONAL  
REPRESENTATIVES OF THE ESTATE OF  
MYRA SINGLETON QUARLES THOMPSON

SWORN TO and subscribed before me this  
28th day of October, 2021.

  
Notary Public for South Carolina

My Commission Expires: 11/13/2024

PERSONALLY APPEARED BEFORE ME, Anthony Thompson and Kevin Singleton, in their capacity as Co-Personal Representatives of the Estate of Myra Singleton Quarles Thompson, who being duly sworn, deposes and say that they are the Petitioners in the foregoing action; that they have read the Petition to Approve Settlement for Survival and Wrongful Death, and the same is true and correct of their own knowledge, save and except those matters and things therein alleged on information and belief; and, as to those matters and things, they believe the same to be true and correct.

ANTHONY THOMPSON and KEVIN SINGLETON

PERSONALLY APPEARED BEFORE ME, Anthony Thompson and Kevin Singleton, in their capacity as Co-Personal Representatives of the Estate of Myra Singleton Quarles Thompson, who being duly sworn, deposes and say that they are the Petitioners in the foregoing action; that they have read the Petition to Approve Settlement for Survival and Wrongful Death, and the same is true and correct of their own knowledge, save and except those matters and things therein alleged on information and belief; and, as to those matters and things, they believe the same to be true and correct.

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SINGLETON, as Co-Personal Representatives	)	
of the Estate of Myra Singleton Quarles	)	
Thompson,	)	
	)	
Plaintiff,	)	<b>CERTIFICATION OF</b>
	)	<b>LEGAL COUNSEL</b>
	)	
v.	)	
	)	
THE UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	

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I, Mullins McLeod, attorney for Claimants Anthony Thompson and Kevin Singleton as Co-Personal Representatives of the Estate of Myra Singleton Quarles Thompson, certifies as follows:

1. I have read the Petition to Approve Settlement for Survival and Wrongful Death.
2. I am of the opinion that the settlement is fair and reasonable and in the best interest of the wrongful death statutory beneficiaries and the Estate of Myra Singleton Quarles Thompson.

RESPECTFULLY SUBMITTED,

By: s/ W. Mullins McLeod, Jr.

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